

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES	:	
	:	
	:	Case No. 1:20-CR-100
v.	:	
	:	
FELICIA DONALD	:	
	:	
Defendant.	:	

MOTION TO RESCHEDULE SENTENCING

COMES NOW THE DEFENDANT, Felicia Donald, through her newly admitted counsel and requests that this Honorable Court remove this case from the sentencing docket of 21 August 2020 at 11:00 am and reset the matter to an agreeable later date so that her new counsel have adequate time to prepare.

This case involves a medical practice and the government's discovery is voluminous. There are 18.5 gigabytes of data, not counting audio recordings. There are hundreds of files representing thousands of pages of medical data. The material includes thousands of messages by the defendant, including both texts and emails, as well as hundreds of pages of financial records. Additionally, there FBI 302s and transcripts of interviews.

The defense will need to review the voluminous medical files with their client. After that review, the defense will need to consult with a physician

who is an expert in the practice of pain medicine. In addition to all of that work, there must also be a financial analysis of the defendant's financial status and background which will also require intensive consultation with the client.

The defense understands that the prosecution has had two agents and at least one prosecutor working on this case since the summer of 2019. The defense wants to present an accurate and correct position to the Court, which requires an extensive period of time to prepare. The defense also needs to conduct its own investigation regarding witnesses which, at this time of COVID-19, is more difficult than it would be otherwise.

Ms. Donald is entitled to effective assistance by informed counsel. The defense is not asking for a year, as the government has had, but does need a fair amount of time to get up to speed in this case. In that regard, this Court is respectfully asked to bear in mind the fact that defense counsel are both solo practitioners who practice in various courthouses in Northern Virginia. Counsel has, as private attorneys do, more than one client. Unlike the Department of Justice, the defense does not have a worldwide network of investigators available 24/7, nor various other experts on the payroll for use whenever, and as needed. The resources of the defense are not equivalent to

those of the federal government. Counsel is asking for the necessary time for the defense to prepare so it can provide effective representation.

WHEREFORE, in consideration of these premises, the attached and incorporated memorandum, and any such other matters as may become evident at the hearing hereon, which hearing is hereby requested, this Court is asked to grant this motion and such other relief as in the cause is deemed just and proper.

FELICIA DONALD
By Counsel

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